

Douglas R. Young (State Bar No. 073248)  
Roderick M. Thompson (State Bar No. 96192)  
Jessica K. Nall (State Bar No. 215149)  
Andrew W. Ingersoll (State Bar No. 221348)  
Farella Braun & Martel LLP  
235 Montgomery Street, 17th Floor  
San Francisco, CA 94104  
Telephone: (415) 954-4400  
Facsimile: (415) 954-4480  
[dyoung@fbm.com](mailto:dyoung@fbm.com)  
[rthompson@fbm.com](mailto:rthompson@fbm.com)  
[jnall@fbm.com](mailto:jnall@fbm.com)  
[aingersoll@fbm.com](mailto:aingersoll@fbm.com)

Attorneys for Defendant  
RANDALL WULFF

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MANI SUBRAMANIAN, as an individual  
and citizen of Washington, and as a derivative  
action plaintiff,

Plaintiff,

vs.

ST. PAUL FIRE AND MARINE  
INSURANCE COMPANY, a Minnesota  
Corporation, and QAD INC., a Delaware  
Corporation with principal place of business  
in California, and ARTHUR ANDERSEN  
LLP, a limited liability partnership  
headquartered in Chicago, Illinois, and  
ANDERSEN WORLDWIDE SC, a Societe  
Cooperative headquartered in Geneva,  
Switzerland, and JOHN DOORDAN, an  
individual and citizen of California, and  
LAIFoon LEE, an individual and Citizen of  
California, and ROLAND DESILETS, an  
individual and citizen of New Jersey, and  
WILLIAM D. CONNELL, an individual an  
citizen of California, and GREENAN  
PFEFFER, SALLANDER and LALLY LLP,  
a limited liability partnership headquartered  
in California, and RANDALL WULFF, an  
individual and citizen of California, and  
DOES 1-50,

Defendants.

Case No. 08-cv-1426-VRW

**DEFENDANT RANDALL WULFF'S  
NOTICE OF JOINDER AND JOINDER IN  
ST. PAUL'S MOTION TO DECLARE  
PLAINTIFF MANI SUBRAMANIAN A  
VEXATIOUS LITIGANT**

Date: October 9, 2008  
Time: 2:30 p.m.  
Dept: Courtroom 6  
Judge: Hon. Vaughn R. Walker

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that, on October 9, 2008, at 2:30 p.m., or as soon thereafter as  
3 the matter may be heard, before The Hon. Vaughn R. Walker, in Courtroom No. 6, on the 17th  
4 Floor, United States District Courthouse, 450 Golden Gate Avenue, San Francisco, California  
5 94102, defendant Randall Wulff ("Wulff") will and hereby does join in the Motion filed with the  
6 Court in the above-captioned matter by Defendant St. Paul Fire and Marine Insurance Company  
7 ("St. Paul") , Inc. for an Order declaring Plaintiff Mani Subramanian a vexatious litigant and for a  
8 pre-filing Order pursuant to 28 United States Code Section 1651 requiring Subramanian to obtain  
9 Court approval before filing any future action or motion related to the settlement agreement of  
10 September 2004.

11 Wulff makes this Joinder based on this Notice, the Memorandum of Points and  
12 Authorities and Requests for Judicial Notice filed by St. Paul in support of its Motion for an  
13 Order declaring Plaintiff Mani Subramanian a vexatious litigant and for a pre-filing Order, and  
14 such further matters and argument, oral or written, as the Court may entertain at the hearing  
15 hereof.

16 Dated: September 4, 2008

FARELLA BRAUN & MARTEL LLP

17  
18 By: /s/  
19 Roderick M. Thompson

20 Attorneys for Defendant  
21 RANDALL WULFF  
22  
23  
24  
25  
26  
27  
28